

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

In re:  
KIDDE-FENWAL, INC.,  
Debtor.

Chapter 11  
Case No. 23-10638 (LSS)

KIDDE-FENWAL, INC.,  
Plaintiff,  
v.  
ACE AMERICAN INSURANCE  
COMPANY, *et al.*,  
Defendants.

Adv. Proc. No. 23-50758 (LSS)

**MOTION OF CERTAIN DEFENDANTS IN ADVERSARY PROCEEDING NO. 23-50758  
TO WITHDRAW THE REFERENCE TO THE BANKRUPTCY COURT PURSUANT  
TO 28 U.S.C. 157(d) AND BANKRUPTCY RULE 5011(a)**

The undersigned, Certain Defendants to Adversary Proceeding No. 23-50758 (herein, “Movants”),<sup>2</sup> pursuant to 28 U.S.C. § 157(d), Federal Rule of Bankruptcy Procedure 5011, and Local Bankruptcy Rule 5011-1, hereby move for entry of an Order withdrawing the reference of

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<sup>1</sup> The last four digits of Kidde-Fenwal, Inc.’s tax identification number are 5282. The Debtor’s corporate headquarters is located at 400 Main Street, Ashland, Massachusetts 01721.

<sup>2</sup> Movants include Wellfleet New York Insurance Company, formerly known as Atlanta International Insurance Company; Columbia Casualty Company; The Continental Insurance Company, on its own behalf and as successor-in-interest to Harbor Insurance Company and London Guarantee and Accident Company of New York; Government Employees Insurance Company (GEICO); American Guarantee and Liability Insurance Company; Zurich American Insurance Company; Endurance American Specialty Insurance Company; Travelers Casualty and Surety Company (f/k/a The Aetna Casualty and Surety Company); Ace American Insurance Company; Century Indemnity Company (as successor to CIGNA Specialty Insurance Company f/k/a California Union Insurance Company; and as successor to CCI Insurance Company, as successor to Insurance Company of North America); Federal Insurance Company; Pacific Employers Insurance Company; TIG Insurance Company, as successor to Gibraltar Casualty Company; Evanston Insurance Company; First State Insurance Company; and Twin City Fire Insurance Company.

the above-captioned adversary proceeding pending in the United States Bankruptcy Court for the District of Delaware (the “Motion”).<sup>3</sup> The grounds for the Motion are fully set forth in an opening brief being filed contemporaneously herewith.

Dated: February 12, 2024

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(GEICO)*

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<sup>3</sup> Pursuant to the Bankruptcy Court’s Local Rule 5011-1, this Motion is being filed with the Bankruptcy Court for transmittal to the United States District Court for the District of Delaware.

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